

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LULULEMON ATHLETICA CANADA INC.,

Plaintiff,

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 22-cv-03706

**NOTICE OF CLAIMS INVOLVING TRADEMARKS**

Pursuant to Local Rule 3.4, Plaintiff Lululemon Athletica Canada Inc. (“Plaintiff” or “Lululemon”), by and through its counsel, hereby provides notice of claims involving trademarks. The information required by the rule and 15 U.S.C. §1116(c) is as follows:




1. Names and Addresses of Litigants:

Lululemon Athletica Canada Inc.  
400-1818 Cornwall Avenue  
Vancouver, British Columbia V6J 1C7  
Canada


The Partnerships and Unincorporated Associations Identified on Schedule “A”  
Addresses Unknown



2. U.S. Registrations upon which suit has been brought include:

Registration No.	Trademark	Goods and Services
4,391,115	LULULEMON	Clothing, namely, t-shirts, shirts, tank tops, sweatshirts, sweaters, jerseys, jumpers, pants, sweatpants, shorts, skirts, dresses, jackets, coats, vests, underwear, socks, warm-up suits, bodysuits, leotards, tights, leggings, leg warmers; headwear, namely, hats, caps,

Registration No.	Trademark	Goods and Services
		toques, visors, headbands, bandanas; clothing accessories, namely, belts, scarves, shawls, shoulder wraps, arm warmers, mittens, gloves; sandals in class 025.
3,990,179	LULULEMON	Retail store services featuring clothing, apparel, accessories, headwear, socks, yoga equipment, athletic equipment, bags, backpacks, tote bags, pre-recorded DVDs, featuring topics relating to yoga instruction, yoga philosophy, exercise and health living; online retail store services featuring clothing, apparel, accessories, headwear, socks, yoga equipment, athletic equipment, bags, backpacks, tote bags, pre-recorded DVDs, featuring topics relating to yoga instruction, yoga philosophy, exercise and health living in class 035.
2,607,811	<b>lululemon</b>  <b>athletica</b>	Clothing, namely, pants, shirts, t-shirts, shorts, sweatshirts, sweatpants, socks, jackets, coats, hats in class 025.
2,460,180		Clothing, namely, pants, shirts, t-shirts, shorts, sweatshirts, sweatpants, socks, jackets, coats, hats in class 025.
3,985,877		Retail store services featuring clothing, apparel, accessories, headwear, socks, yoga equipment, athletic equipment, bags, backpacks, tote bags, pre-recorded DVDs, featuring topics relating to yoga instruction, yoga philosophy, exercise and health living; online retail store services featuring clothing, apparel, accessories, headwear, socks, yoga equipment, athletic equipment, bags, backpacks, tote bags, pre-recorded DVDs, featuring topics relating to yoga instruction, yoga philosophy, exercise and health living in class 035.

<b>Registration No.</b>	<b>Trademark</b>	<b>Goods and Services</b>
3,024,374	LUON	Clothing, namely, T-shirts, shirts, pants, shorts, sweatshirts, sweatpants, tank tops, jackets, coats and hats for men, women and children in class 025.
3,116,371	SILVERESCENT	Clothing, namely T-shirts, shirts, pants, shorts, skirts, dresses, sweatshirts, sweatpants, tank tops, underwear, socks, jackets, coats, headwear, footwear in class 025.
3,272,013	VITASEA	Dresses; Pants; Shirts; Skirts; Sweat pants; Sweat shirts; T-shirts; Tank tops; Underwear in class 025.
3,976,389	LUXTREME	Body suits; Jackets; Leggings; Pants; Shirts; Shorts; Skirts; Tank tops; Tights in class 025.
3,978,257	GROOVE	Yoga pants in class 025.
3,978,258	GROOVE PANT	Yoga pants in class 025.
4,033,939	SET-MY-PONYTAIL-FREE	Clothing, namely, hooded sweatshirts, jackets and coats; Headwear, namely, hats and caps in class 025.
4,214,049	WUNDER UNDER	Clothing, namely crop pants, pants, shorts, tights, leggings in class 025.
4,214,052	POWER Y	Clothing, namely, tank tops, bras in class 025.
4,219,265	RULU	Clothing, namely, T-shirts, shirts, pants, shorts, sweatshirts, sweatpants, tank tops, underwear, socks, jackets, coats and hats for men, women and children in class 025.
4,234,113	DEFINE JACKET	Clothing, namely, jackets in class 025.
4,333,759	SCUBA	Clothing, namely, hooded sweatshirts, jackets, coats, tops in class 025.

Registration No.	Trademark	Goods and Services
4,832,139	CUFFINS	Clothing, namely, jackets, sweatshirts, shirts, sweaters in class 025.
4,905,437	PACE BREAKER	Clothing, namely, shorts and underwear in class 025.
4,964,908	FULL-ON	Athletic apparel, namely, pants, shorts, crop pants, tights and leggings all for men, women and children; all of the foregoing expressly excluding cosmetics in class 025.
5,040,370	ALL THE RIGHT PLACES	Clothing, namely, crop pants, pants, shirts, tights, leggings in class 025.
5,041,355	BLOCK-IT POCKET	Clothing, namely, pants, sweatpants, shorts in class 025.
5,413,086	SWIFTLY	Clothing, namely, t-shirts, shirts, tank tops, sweatshirts, sweaters; clothing accessories, namely, arm warmers and scarves; headwear, namely, headbands in class 025.
5,617,645	TIGHT STUFF	Clothing, namely, pants, tights, and leggings in class 025.
5,666,869	NULU	Clothing, namely, shirts, tank tops, pants, sweatpants, shorts, dresses, jackets, bodysuits, leotards, tights, bras in class 025.
5,751,880	SERIOUSLY LIGHT	Clothing, namely, t-shirts, shirts, tank tops and headbands in class 025.
4,897,183		Hooded sweat shirts; Jackets; Coats in class 025.

Registration No.	Trademark	Goods and Services
4,986,083		Clothing, namely, tights, pants in class 025.
5,393,854		Clothing, namely, tights, pants, leggings in class 025.

Dated this 18th day of July 2022.

Respectfully submitted,

/s/ Justin R. Gaudio

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